

UNITED STATES OF AMERICA)

v.)

Manning, Bradley E.)
PFC, U.S. Army,)
HHC, U.S. Army Garrison,)
Joint Base Myer-Henderson Hall)
Fort Myer, Virginia 22211)

STIPULATION OF
EXPECTED TESTIMONY

Mr. Doug Schasteen

9 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Mr. Doug Schasteen were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows:

1. While I currently work for a private software company in Seattle, Washington, I was previously the IT Director at Willco Technologies. I held that position for six years. In that position, I took care of all the technology-related tasks and served as the main point of contact and database administrator for the U.S. Army's Training & Certifications Tracking System (ATCTS). The U.S. Army hired Willco Technologies to build and then maintain a database tracking system for U.S. Army Information Assurance (IA) certifications. I developed the database and oversaw its development.

2. I recognize **Prosecution Exhibit (PE) 114 for Identification** (BATES numbers: 00411400 - 00411401) as a print out from the ATCTS. ATCTS is the database I built, and it tracks the activity status of U.S. Army personnel as well as the dates of the users' information assurance (IA) training certifications. I recognize **PE 114 for ID** as the one I provided on 31 January 2012 to investigators in the present case against PFC Manning. Along with **PE 114 for ID**, I provided an attestation to its authenticity notarized by a Notary Public and it is identified at BATES number: 00411399.

3. **PE 114 for ID** shows PFC Manning's IA certification status. It shows that the user name: "Bradley Manning" is no longer active in our system. All soldiers must have IA training, at least, on a yearly basis. As a soldier, he would have an account in our system. **PE 114 for ID** shows PFC Manning's IA trainings were dated 5 September 2008 and then 31 October 2009. This tells us that PFC Manning had received the yearly IA training and associated certification necessary for computer usage through October 2010. As of the time I provided this print out in January of 2012, PFC Manning had an "inactive status". Accordingly, his account had been disabled and he wouldn't be able to log in. A user attains this status when (s)he is not in compliance with the yearly IA requirement. For users who are in compliance, their unit identifiers show up in the lines indicating "command" and "unit".

4. This training information is collected automatically by the Army Signal Command at Fort Gordon, GA, when a user completes the annual IA exam online. It is then transmitted to our system for automatic updating. Our system further tracks the extra training necessary for users who are certified as system administrators. Our system shows PFC Manning has not had any of the required system administrator trainings.



ASHDEN FEIN
MAJ, JA
Trial Counsel



THOMAS F. HURLEY
MAJ, JA
Military Defense Counsel



BRADLEY E. MANNING
PFC, USA
Accused